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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers
12 Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust
13 2005-2*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, FORMERLY KNOWN AS
18 BANKERS TRUST COMPANY OF
19 CALIFORNIA, N.A., AS TRUSTEE FOR
20 AMERICAN HOME MORTGAGE
21 INVESTMENT TRUST 2005-2,

22 Plaintiff,
23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
26 INSURANCE COMPANY;
27 COMMONWEALTH LAND TITLE
28 INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 36]**

[Fourth Request]

23 Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust
24 Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-
25 2 (“Deutsche Bank”) and Defendant, Commonwealth Land Title Insurance Company
26 (“Commonwealth”), by and through their attorneys of record, hereby stipulate and agree as
27 follows:
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- 1 1. On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
- 2 District Court, Case No. A-20-821781-C [ECF No. 1-1];
- 3 2. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF
- 4 No. 1];
- 5 3. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
- 6 4. On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's
- 7 Motion to Dismiss and Counter motion for Partial Summary Judgment [ECF Nos. 24
- 8 and 25];
- 9 5. On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to
- 10 Dismiss and Opposition to Counter motion for Partial Summary Judgment [ECF No.
- 11 36];
- 12 6. Deutsche Bank contends that it is entitled to file a response to Commonwealth's
- 13 Opposition to its Counter motion for Partial Summary Judgment and that its deadline
- 14 to do so is January 19, 2021 [ECF No. 44];
- 15 7. Deutsche Bank's counsel is requesting an extension until March 1, 2021 to respond
- 16 to Commonwealth's Opposition;
- 17 8. This additional extension is requested to allow Deutsche Bank additional time to
- 18 finalize and file its response to the Opposition as lead handling counsel for Deutsche
- 19 Bank continues to recover from an unexpected medical emergency.
- 20 9. Counsel for Commonwealth does not oppose the requested extension to the extent
- 21 that a response is permitted;

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1 10. This is the fourth request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 2nd day of February, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

6 */s/ Lindsay D. Robbins*

7 Lindsay D. Robbins, Esq.

8 Nevada Bar No. 13474

9 7785 W. Sahara Ave., Suite 200

10 Las Vegas, NV 89117

11 *Attorneys for Plaintiff, Deutsche Bank
National Trust Company, Formerly Known as
Bankers Trust Company of California, N.A.,
as Trustee for American Home Mortgage
Investment Trust 2005-2*

12 DATED this 2nd day of February, 2021.

13 SINCLAIR BRAUN LLP

14 */s/ Kevin S. Sinclair*

15 Kevin S. Sinclair, Esq.

16 Nevada Bar No. 12277

17 16501 Venture Blvd., Suite 400

18 Encino, CA 91436

19 *Attorneys for Defendants, Commonwealth
Land Title Insurance Company, Fidelity
National Title Group, Inc., and Fidelity
National Title Insurance Company*

20 **IT IS SO ORDERED.**

21 DATED this 2nd day of February, 2021.

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24 UNITED STATES DISTRICT JUDGE

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